

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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In re: BAIR HUGGER FORCED AIR  
WARMING DEVICES PRODUCTS  
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:  
All Actions

**DEFENDANTS' MOTION FOR  
PROTECTIVE ORDER  
CONCERNING PLAINTIFFS'  
SUBPOENAS TO THIRD-PARTY  
MANUFACTURERS OF PATIENT  
WARMING DEVICES**

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Pursuant to Federal Rule of Civil Procedure 37(b)(2)(A)(vii) and Local Rules 7.1 and 37.1, Defendants 3M Company and Arizant Healthcare Inc. (collectively "Defendants") respectfully move the Court for a protective order (i) barring Plaintiffs from pursuing discovery from the third-party manufacturers that Plaintiffs subpoenaed on February 17, 2017, to the extent that discovery concerns conductive patient warming devices; and (ii) barring Plaintiffs from pursuing discovery concerning any convective warming devices sold by these companies unless and until Plaintiffs demonstrate that some component of those devices could be incorporated into the 3M™ Bair Hugger™ system.

Dated: March 10, 2017

Respectfully submitted,

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